

IN THE UNITED STATES DISTRICT COURT  
FOR THE DELAWARE DISTRICT

R.W., A Minor, individually, by and through  
his parent and natural guardian SARAH WILLIAMS  
and SARAH WILLIAMS, individually,  
PLAINTIFFS,

V.

THE DELAWARE DEPARTMENT OF  
EDUCATION; VALERIE WOODRUFF;  
personally and in her official capacity as  
the Secretary of Education for the State of  
Delaware; THE STATE OF DELAWARE BOARD  
OF EDUCATION; and JOSEPH PIKA, Ph.D.;  
JEAN ALLEN; RICHARD M. FARMER, JR.;  
MARY GRAHAM, ESQ.; BARBARA RUTT;  
DENNIS SAVAGE; CLAIRBOARNE D.  
SMITH; ANNE CASE; VALERIE WOODRUFF;  
personally and in their official capacity as Members  
of the State Board of Education; and  
THE CHRISTINA SCHOOL DISTRICT; JOSEPH J.  
WISE, personally and in his official capacity as the  
Superintendent of the District; DAVID SUNSTROM,  
personally and in his official capacity as the Assistant  
Superintendent of the District; SANDRA COUNTLEY  
personally and in her official capacity; SHARON  
DENNY, personally and in her official capacity;  
FREEMAN WILLIAMS, personally and in his official  
capacity; THE CHRISTINA SCHOOL DISTRICT  
SCHOOL BOARD; BRENDA PHILLIPS;  
JAMES DURR; GEORGE EVANS, ESQUIRE;  
BEVERLY HOWELL; CONSTANCE MERLET  
JOHN MACKENZIE, CECELIA SCHERER; and  
JOSEPH WISE; all personally and in their official  
capacity as Members of the CHRISTINA  
SCHOOL DISTRICT.

DEFENDANTS.

C.A. NO. 05-CV-00662

**E-FILE**

JURY TRIAL OF TWELVE  
DEMANDED

**REDACTED  
EXHIBITS 1-5 TO  
ANSWER TO COMPLAINT**

WHITE AND WILLIAMS LLP

BY:



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*Scherer*